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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Denise Carlon, Esquire KML Law Group, P.C. 701 Market Street, Suite 5000 Philadelphia, PA 19106 Main Phone: 201-549-2363 dcarlon@kmllawgroup.com Attorneys for Secured Creditor PNC Bank, National Association

In Re:

April A. Lee, Keith M. Lee Debtors Order Filed on June 5, 2023 by Clerk U.S. Bankruptcy Court District of New Jersey

Case No: <u>19-22682 MBK</u>

Chapter: 13

Judge: Michael B. Kaplan

CONSENT ORDER REINSTATING AUTOMATIC STAY

The relief set forth on the following page is hereby ordered **ORDERED**.

DATED: June 5, 2023

Honorable Michael B. Kaplan United States Bankruptcy Judge Page 2

Debtor: April A. Lee, Keith M. Lee

Case No.: 19-22682 MBK

Caption: CONSENT ORDER REINSTATING AUTOMATIC STAY

This matter, having been brought before the Court by Denise Carlon, Esq., KML Law Group, P.C., attorneys for Secured Creditor, PNC Bank, National Association, upon a consent order to reinstate the automatic stay as to real property 121 Bertram Avenue, South Amboy, NJ, 08879, and with the consent of Warren Brumel, Esq., counsel for the Debtors;

It is hereby **ORDERED**, **ADJUDGED** and **DECREED** that the automatic stay as to 121 Bertram Avenue, South Amboy, NJ, 08879 is hereby reinstated; and

It is further **ORDERED**, **ADJUDGED** and **DECREED** that the Order Vacating Stay entered March 8, 2023(#38 on the docket) is hereby vacated; and

It is further **ORDERED**, **ADJUDGED** and **DECREED** that loas is currently due for post-petition payments in the amount of \$1,781.85 from November 2022 through April 2023 for a total default of \$10,691.10; and

It is further **ORDERED**, **ADJUDGED** and **DECREED** that Debtor is to make a lump sum payment in the amount of \$10,691.10 curing post-petition arrears by May 31, 2023; and

It is further **ORDERED**, **ADJUDGED** and **DECREED** that regular mortgage payments are to resume May 1, 2023, directly to Secured Creditor's servicer (Note: the amount of the monthly mortgage payment is subject to change according to the terms of the note and mortgage); and

It is further **ORDERED**, **ADJUDGED** and **DECREED** that for the Duration of Debtor's Chapter 13 bankruptcy proceeding, if any of the cure payments or regular monthly mortgage payments are not made within thirty (30) days of the date said payment is due, Secured Creditor may obtain an Order Vacating Automatic Stay as to Real Property by submitting a Certification of Default to the Court indicating such payment is more than thirty days late, and Debtors shall have fourteen days to respond; and

It is further **ORDERED**, **ADJUDGED** and **DECREED** that a copy of any such application, supporting certification, and proposed Order must be served on the Trustee, Debtor, and Debtor's counsel at the time of submission to the Court; and

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Debtor: April A. Lee, Keith M. Lee

Case No.: 19-22682 MBK

Caption: CONSENT ORDER REINSTATING AUTOMATIC STAY

It is further **ORDERED**, **ADJUDGED** and **DECREED** that Secured Creditor is hereby awarded reimbursement of fees and costs in the sum of \$200.00, which is to be paid through Debtors' Chapter 13 plan.

I hereby agree and consent to the above terms and conditions: Dated: 5/17/2023

/s/ Denise Carlon

DENISE CARLON, ESQ., ATTORNEY FOR CREDITOR

I hereby agree and consent to the above terms and conditions: Dated: 05/25/2023

/s/ Warren Brumel

WARREN BRUMEL, ESQ., ATTORNEY FOR DEBTOR